

**UNITED STATES OF AMERICA**

**BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**CORESLAB STRUCTURES (TULSA)  
INC.,**

**RESPONDENT,**

**AND**

**INTERNATIONAL UNION OF  
OPERATING ENGINEERS LOCAL 627,  
AFL-CIO**

**CHARGING PARTY.**

**CASES 14-CA-248354  
14-CA-248812**

**CORESLAB’S REQUEST FOR AN EXTENSION OF TIME TO FILE EXCEPTIONS  
AND A SUPPORTING BRIEF**

Comes now CORESLAB STRUCTURES (TULSA) INC. (hereinafter “Respondent”), by its attorneys and, pursuant to § 102.46 of the National Labor Relations Board’s Rules and Regulations requests a 30-day extension (from March 11, 2021, until and including April 12, 2021) to file Exceptions and a supporting brief to the Administrative Law Judge’s February 11, 2021, decision and, in support thereof, states as follows:

1. This matter was submitted to Administrative Law Judge Robert A. Ringler (“ALJ Ringler”).
2. Respondent and Counsel for the General Counsel offered, and ALJ Ringler admitted, numerous Exhibits totaling more than six hundred fifty (650) pages.
3. On February 11, 2021, ALJ Ringler issued his written decision totaling approximately nineteen (19) pages.

4. On February 25, 2021, our law firm was retained to represent Respondent in filing Exceptions and supporting brief relating to this case. That same day, Respondent's counsel from the proceedings with ALJ Ringler transferred the record to Respondent's undersigned counsel.

5. The undersigned respectfully require additional time to review the record at issue and prepare Respondent's Exceptions and supporting brief.

6. The requested extension is for good cause, and is needed due to the complexity of the issues involved, the extent of the record, and counsel's schedule during the briefing period.

7. Counsel for Respondent has contacted Counsel for the General Counsel and outlined Respondent's intention to seek an extension to April 12, 2021 to file Exceptions and a supporting brief. William F. LeMaster, Counsel for the General Counsel, responded that the Region has no objection to this request for a 30-day extension.

8. As of the time of this filing, Counsel for Charging Party has not yet responded to Respondent's counsel's communication about its intent to seek an extension until April 12, 2021 to file Exceptions and a supporting brief.

9. Given the absence of objection to this reasonable request, Respondent respectfully requests an extension of time – from March 11, 2021, until April 12, 2021 – for the purpose of filing Exceptions and a supporting brief to ALJ Ringler's decision with the Board.

Respectfully submitted,

DATED: March 1, 2021

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Bindu R. Gross

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Attorneys for Respondent

\* Currently licensed in Pennsylvania and West Virginia  
only; practice limited exclusively to federal labor and  
workplace safety law.

### **CERTIFICATE OF SERVICE**

The undersigned certifies that on the **1st** day of **March**, **2021**, the foregoing, **CORESLAB'S REQUEST FOR AN EXTENSION OF TIME TO FILE EXCEPTIONS AND A SUPPORTING BRIEF**, was filed by electronic filing with the office of Executive Secretary, and served via email upon:

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/s/ Bindu R. Gross

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